

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION

UNITED STATES OF AMERICA	)	CR. NO. 8:20-CR-452-DCC
	)	
	)	
vs.	)	
	)	
	)	
JOHN TOWERY	)	
	)	

**MOTION FOR DOWNWARD DEPARTURE**

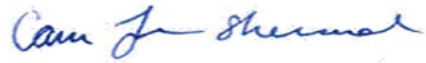
NOW COMES the United States, by and through its undersigned attorney, and respectfully moves the above-referenced court pursuant to § 5K1.1 of the United States Sentencing Guidelines and Title 18, United States Code, § 3553(e), to depart downward from the applicable guidelines regarding the defendant, JOHN TOWERY, and, in support of such motion, does state as follows:

TOWERY cooperated with federal and local law enforcement regarding his knowledge of and involvement in the above-captioned case. TOWERY assisted in identifying a co-defendant which contributed to the Government ultimately obtaining a guilty plea for this co-defendant. Additional details of the cooperation may be set forth at the sentencing hearing as needed. Based on the substantial assistance provided to the Government, the Government believes a downward departure is appropriate.

WHEREFORE, the Government moves that this Honorable Court grant the Motion for Downward Departure as herein requested in the case of JOHN TOWERY.

Respectfully submitted,

COREY F. ELLIS  
UNITED STATES ATTORNEY



Carrie Fisher Sherard  
Assistant United States Attorney

Dated: January 12, 2022